

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

MICHAEL JENKINS, *et al.*

Plaintiffs,

v.

RANKIN COUNTY, MISSISSIPPI, *et al.*,

Defendants.

:
:
:
:
:
:
:
:
:
:
:
:

**Civil Action No.
3:23-cv-374-DPJ-ASH**

PLAINTIFFS' MOTION FOR LEAVE TO FILE

Come now, the Plaintiffs, by and through counsel, and pursuant to F.C.R.P. Rule 37 and hereby moves the Court for Leave to File their Motion to Compel discovery responses [Doc.136]. Plaintiffs' Motion to Compel relates to Plaintiffs' Request for Documents #6, # 15, #17, #23, #2, #29, #30. Plaintiffs were ordered by the court to file their Motion to Compel on March 27, 2025. However, for good cause Plaintiffs are filing their motion approximately four (4) hours behind the filing deadlines. Counsel apologizes to the Court, stating that present obligations with its opposition to summary judgment and other litigation across the country caused a delay in meeting the March 27, 2025, deadline.

For the foregoing reasons, Plaintiffs request the Honorable Court to permit the late filing of its Motion to Compel Discovery Responses.

Respectfully submitted by:

/s/ MALIK SHABAZZ ESQ /S/
MALIK SHABAZZ, Esq.

The Law Office of Malik Shabazz, Esq.
[admitted Pro Hac Vice]

700 Pennsylvania Ave SE
Washington, DC 20003
[Email: attorney.shabazz@yahoo.com](mailto:attorney.shabazz@yahoo.com)
Tel: (301) 513-5445
Fax: (301) 513-5447
(Lead counsel for Plaintiff)

/S/ TRENT WALKER ESQ /S/
TRENT WALKER, Esq.
The Law Offices of Trent Walker
M.S.B. 10475
5245 Keele Street Suite A
Jackson, Mississippi 39206
Email: Trent@Trentwalkeresq.com (Mississippi
Local Counsel)
(601) 321-9540

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 28th day of March 2025 I electronically transmitted this Motion for Leave to opposing counsel.

/s/Malik Z. Shabazz/s/

Malik Z. Shabazz Esq.